

March 8, 2016

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VIA FACSIMILE

Hon. Laura Taylor Swain
United States District Court
Southern District of New York
Room 1320
500 Pearl Street
New York, NY 10007

RE: Graciela Bretschneider Doncouse v. Zadig & Voltaire-New York Limited Liability Company, and Herbert Moskowitz, U.S. Southern District of New York
File No. 15 CIV 09851 (LTS)

Dear Judge Swain:

I am writing pursuant to Rule 1(f) of this Court's Individual Practices and Procedures to request a continuance of the Initial PreTrial Conference currently set for **May 11, 2016, at 11:30 a.m.** in courtroom 12D. I am also writing to inform the court of an agreed extension of time to respond to Plaintiff's Original Complaint.

While the docket sheet indicates that Defendant Zadig & Voltaire was served via the Secretary of State, we have yet to receive any information from the Secretary of State regarding this lawsuit. Defendant became aware of this lawsuit based on information it received from Defendant Herbert Moskowitz.

We have contacted Plaintiff's counsel regarding this matter and secured an extension of time until **March 14, 2016**, to file our Answer. Since this date is after the scheduled Initial PreTrial Conference, we request that the Initial PreTrial Conference be continued so that Defendant will have time to review these claims, answer the lawsuit and comply with the requirements this Court laid out in its Initial Conference Order. Defendant has communicated with counsel for Plaintiff Graciela Doncouse and Defendant Herbert Moskowitz who consent to Defendant's request to continue the Initial PreTrial Conference. This is the first request by Defendant for an adjournment. Accordingly, Defendant proposes that the Initial PreTrial Conference be continued for thirty (30) days.

We thank the Court for its consideration of this request.

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Respectfully submitted,

By: /s/ Philippe C. M. Manteau

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